



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

September 19, 2002

10 CFR 50.44

Rules and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Gentlemen:

NUCLEAR REGULATORY COMMISSION (NRC) - COMMENTS ON DRAFT  
REGULATORY GUIDE (DG) -1117 - VOL. 67 *FEDERAL REGISTER* 53628, DATED  
AUGUST 16, 2002

TVA appreciates the opportunity to comment on the proposed Draft Regulatory Guide (DG) -1117, *Control of Combustible Gas Concentration in Containment*. NRC developed DG-1117 to provide suitable guidance for meeting the requirements of a proposed amendment to 10 CFR 50.44.

TVA's comments are provided in the enclosure.

If you have any questions, please contact R. M. Brown at (423) 751-7228.

Sincerely,

A handwritten signature in black ink that reads "Mark J. Burzynski". The signature is fluid and cursive, with a prominent "M" and "B".

Mark J. Burzynski  
Manager  
Nuclear Licensing

Enclosure

cc (Enclosure):

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

# ENCLOSURE

## COMMENTS ON PROPOSED DG 1117

COMMENT NUMBER	DG 1117 SECTION	COMMENTS
1	C.2.2	The third sentence states that "Safety-related oxygen monitoring systems installed and approved by the NRC prior to the effective date of the rule are sufficient to meet this criterion." While this is acceptable, it would be better if the guide used the words provided with the proposed change to 10 CFR 50.44 that states "Existing oxygen monitoring commitments for currently licensed plants meet the intent of the rule."
2	C.2.2	Add to this section that oxygen monitors are required only for plants that inert containment.
3	C.5	This section, titled "Containment Structural Integrity," should state that this does not apply to currently licensed plants, but new plants. This change is consistent with the wording in the rule.